

12-Person Jury

FILED  
8/19/2021 1:57 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2021L008366

STATE OF ILLINOIS  
IN THE CIRCUIT COURT FOR COOK COUNTY, ILLINOIS  
COUNTY OF COOK

DALE D. WHITE,

Plaintiff,

vs.

JOHN G. PAPPAS, and  
VITRACOAT AMERICA, INC.,

Defendants.

2021 L 8366

Plaintiff demands trial by a jury  
of twelve (12) persons.

COMPLAINT AT LAW

COUNT I

NEGLIGENCE-DEFENDANT PAPPAS

NOW COMES the Plaintiff, DALE D. WHITE, by and through his attorney, Mark A. Byrd, and for his Complaint against the Defendant, JOHN G. PAPPAS, hereby avers and alleges as follows:

1. At all times relevant hereto, Plaintiff was and is a resident of Winnebago County, in the State of Illinois.
2. At all times relevant hereto, Defendant Pappas was and is a resident of the City of Aurora, in the County of DuPage, in the State of Illinois and Defendant VITRACOAT AMERICA, INC. was and is a Delaware Corporation with its principal place of business located in Elkhart, Indiana, and on information and belief doing business in the State of Illinois.
3. At all times relevant hereto, on information and belief the Defendant PAPPAS was in the

**EXHIBIT A**

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- employ of Defendant VITRACOAT AMERICA, INC., and was operating his company vehicle in the scope of his employment with VITRACOAT AMERICA, INC.
4. At all times relevant hereto, the intersection of I-290 Westbound and Austin Boulevard lies in the City of Chicago, County of Cook, in the State of Illinois.
  5. Jurisdiction and venue is proper in Cook County, Illinois, as this action involves a motor vehicle accident which occurred in Cook County, Illinois.
  6. On August 24, 2019, at approximately 6:10 a.m., Plaintiff was operating his 2006 Harley Davidson FXDB Westbound on I-290 in the center lane of Westbound traffic approaching the intersection of Austin Boulevard.
  7. On August 24, 2019, at approximately 6:10 a.m., Defendant PAPPAS was operating his motor vehicle, a 2018 Ford Edge owned on information and belief by Defendant VITRACOAT AMERICA, INC., and was, on information and belief a company vehicle used by Defendant PAPPAS who was an employee of the Defendant operating said vehicle in the scope of his employment with Defendant VITRACOAT AMERICA, INC.
  8. At approximately 6:10 a.m. on August 24, 2019, Defendant PAPPAS was driving the 2018 Ford Edge on Westbound I-290 near the intersection of Austin Boulevard, in the Southernmost lane of Westbound I-290 traffic, immediately to the left and a short distance behind the Plaintiff.
  9. At all times relevant hereto Plaintiff was operating his vehicle with ordinary care and in a manner free from negligence.
  10. As Plaintiff approached the intersection of I-290 and Austin Boulevard, Defendant PAPPAS approached Plaintiff and passed by him on Plaintiff's left then immediately

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executed a lane change from the southernmost westbound lane of traffic into the Plaintiff's lane of traffic right in front of the Plaintiff, then immediately and forcefully applied his brakes, causing Plaintiff's motorcycle to run into the back end of Defendant's vehicle, and throwing Plaintiff from his vehicle into the air and onto the pavement of the roadway causing severe property damage and bodily injury.

11. At all times relevant hereto, Defendant PAPPAS owed to Plaintiff and all other motorists operating their vehicles in the vicinity a duty of ordinary care in the operation of his motor vehicle on the roadway, and a duty to operate his motor vehicle in a manner that was free from negligence.
12. Defendant PAPPAS then and there breached his duty of ordinary care owed to the Plaintiff in the following respects:
  - A. Defendant PAPPAS failed to keep a proper lookout for the Defendant's motorcycle and the vehicles traveling westbound in front of them before executing a lane change immediately in front of Plaintiff's vehicle;
  - B. Defendant PAPPAS operated his vehicle on the roadway at an excessive rate of speed given the traffic conditions at the time;
  - C. Defendant PAPPAS failed to wait to execute the lane change in front of Plaintiff's vehicle until it was safe to do so;
  - D. Defendant PAPPAS forcefully applied his brakes immediately following his lane change without regard for traffic behind him at the time, including Plaintiff;
  - E. Defendant PAPPAS failed to properly signal before executing his lane change;and

F. Defendant PAPPAS was otherwise negligent in the operation of his motor vehicle.

13. As a direct and proximate result of Defendant's failure to operate his vehicle with ordinary care and due to Defendant driving in a negligent manner, Plaintiff sustained severe and irreparable injuries to his person and property damage, and suffered both pecuniary losses as well as continuing and ongoing injuries to his person.

14. Plaintiff demands a trial by a jury of twelve (12) persons.

WHEREFORE, the Plaintiff, DALE D. WHITE, demands judgment against the Defendant, JOHN G. PAPPAS, in an amount in excess of Fifty Thousand Dollars (\$50,000.00) plus costs of suit.

COUNT II

(RESPONDEAT SUPERIOR AS TO DEFENDANT VITRACOAT AMERICA, INC.)


NOW COMES the Plaintiff, DALE D. WHITE, by and through his attorney, Mark A. Byrd, and for Count II of his Complaint against Defendant VITRACOAT AMERICA, INC., does hereby aver and allege as follows:

- 1.-13. For Paragraphs 1-13 of Count II of Plaintiff's Complaint, Plaintiff repeats and realleges paragraphs 1 - 13 of Count I as more fully set forth therein.
14. That Defendant, VITRACOAT AMERICA, INC., is liable to Plaintiff for any and all injuries and property damage sustained by the Plaintiff due to Defendant PAPPAS' negligence while operating his motor vehicle in the scope of his employment with VITRACOAT AMERICA, INC. under the theory of respondeat superior.
15. That Plaintiff demand a trial by a jury of Twelve (12) persons.

WHEREFORE, the Plaintiff, DALE D. WHITE, demands judgment against the Defendant, VITRACOAT AMERICA, INC., in an amount in excess of Fifty Thousand Dollars (\$50,000.00) plus costs of suit.



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DALE D. WHITE

STATE OF ILLINOIS

)  
) ss  
)

COUNTY OF WINNEBAGO

Under the penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that they verily believe the same to be true.

  
DALE D. WHITE

Subscribed to and Sworn  
to before me this 19<sup>th</sup>  
day of ~~February~~, 2021.  
August,

  
Notary Public



Mark A. Byrd  
Attorney at Law  
IARDC 6206618  
308 W. State St. Ste. 450  
Rockford, IL 61101  
(815) 965-5492 Office  
(815) 964-5395 Fax  
byrdlaw@comcast.net  
**Cook Co. Atty. # 38336**

**EXHIBIT A**

Hearing Date: No hearing scheduled  
 Location: <<CourtRoomNumber>>  
 Judge: Calendar, E

This form is approved by the Illinois Supreme Court and is required to be accepted in all Illinois Circuit Courts

FILED  
 3/28/2022 2:30 PM  
 IRIS Y. MARTINEZ  
 CIRCUIT CLERK  
 COOK COUNTY, IL  
 2021L008366  
 Calendar, E  
 17265127

<b>STATE OF ILLINOIS,</b> <b>CIRCUIT COURT</b> Cook <input checked="" type="checkbox"/> COUNTY		<b>PROOF OF SERVICE OF</b> <b>SUMMONS AND</b> <b>COMPLAINT/PETITION</b>	
<b>Instructions</b> Enter above the county name where the case was filed. Enter your name as Plaintiff/Petitioner. Enter the names of all people you are suing as Defendants/Respondents. Enter the Case Number given by the Circuit Clerk.		DALE D. WHITE <b>Plaintiff / Petitioner</b> (First, middle, last name)  v. JOHN G. PAPPAS and VITRACOAT AMERICA, INC., <b>Defendant / Respondent</b> (First, middle, last name) <input type="checkbox"/> <b>Alias Summons</b> (Check this box if this is not the 1 <sup>st</sup> Summons issued for this Defendant.)	
		2021 L 8366 <b>Case Number</b>	

**\*\*Stop. Do not complete the form. The sheriff or special process server will fill in the form.\*\***

My name is Ed Fred Silvetti 960 and I state  
 First, Middle, Last

☒ I served the **Summons and Complaint/Petition** on the Defendant/Respondent  
John G Pappas as follows:  
 First, Middle, Last

☐ Personally on the Defendant/Respondent:

Male ☐ Female ☐ Non-Binary ☐ Approx. Age: \_\_\_\_\_ Race: \_\_\_\_\_  
 On this date: \_\_\_\_\_ at this time: \_\_\_\_\_ ☐ a.m. ☐ p.m.  
 Address, Unit#: \_\_\_\_\_  
 City, State, ZIP: \_\_\_\_\_

☒ On someone else at the Defendant/Respondent's home who is at least 13 years old and is a family member or lives there:

On this date: 2-28-22 at this time: 1:00 ☐ a.m. ☒ p.m.  
 Address, Unit#: 3653 Periwinkle Way  
 City, State, ZIP: Naples FL 34104  
 And left it with: Lu Ann Pappas - spouse  
 First, Middle, Last

Male ☐ Female ☒ Non-Binary ☐ Approx. Age: 65 Race: W  
 and by sending a copy to this defendant in a postage-paid, sealed envelope to the above address on \_\_\_\_\_, 20\_\_\_\_.

☐ On the Corporation's agent,

\_\_\_\_\_  
 First, Middle, Last

Male ☐ Female ☐ Non-Binary ☐ Approx. Age: \_\_\_\_\_ Race: \_\_\_\_\_  
 On this date: \_\_\_\_\_ at this time: \_\_\_\_\_ ☐ a.m. ☐ p.m.  
 Address: \_\_\_\_\_  
 City, State, ZIP: \_\_\_\_\_

Enter the Case Number given by the Circuit Clerk: 2021 L 8366

☐ I was not able to serve the **Summons and Complaint/Petition on Defendant/Respondent:**

First, Middle, Last \_\_\_\_\_

I made the following attempts to serve the *Summons* and Complaint/Petition on the Defendant/Respondent:

1. On this date: \_\_\_\_\_ at this time: \_\_\_\_\_ ☐ a.m. ☐ p.m.  
 Address: \_\_\_\_\_  
 City, State, ZIP: \_\_\_\_\_  
 Other information about service attempt: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
2. On this date: \_\_\_\_\_ at this time: \_\_\_\_\_ ☐ a.m. ☐ p.m.  
 Address: \_\_\_\_\_  
 City, State, ZIP: \_\_\_\_\_  
 Other information about service attempt: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
3. On this date: \_\_\_\_\_ at this time: \_\_\_\_\_ ☐ a.m. ☐ p.m.  
 Address: \_\_\_\_\_  
 City, State, ZIP: \_\_\_\_\_  
 Other information about service attempt: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**DO NOT** complete this section. The sheriff or private process server will complete it.

If you are a special process server, sheriff outside Illinois, or licensed private detective, your signature certifies that everything on the **Proof of Service of Summons** is true and correct to the best of your knowledge. You understand that making a false statement on this form could be perjury.

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

By: \_\_\_\_\_

Signature by: \_\_\_\_\_

☐ Sheriff☒ Sheriff outside Illinois:Collier Co., Florida

County and State

☐ Special process server☐ Licensed private detective

Print Name \_\_\_\_\_

**FEES**

Service and Return:	\$
Miles	\$
Total	\$ 0.00

If *Summons* is served by licensed private detective or private detective agency:  
 License Number: \_\_\_\_\_



**COLLIER COUNTY SHERIFF'S OFFICE  
RETURN OF SERVICE**

Plaintiff/Attorney:

MARK A BYRD, P.C.  
308 W STATE ST., STE 450  
ROCKFORD, FL 61101

Court: STATE OF ILLINOIS - CIRCUIT

County: COOK

CSE No.:

Case No.: 2021L8366

Appearance Date: Time:

Plaintiff:

DALE D WHITE

Defendant:

JOHN G PAPPAS AND  
VITRACOAT AMERICA, INC.

Person to  
Serve:

JOHN G PAPPAS

Service  
Address:

3653 PERIWINKLE WAY  
NAPLES, FL 34114-2538

Type of Writ:

D30/ALIAS SUMMONS/COMPLAINT AT LAW

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Received this writ on February 23, 2022, at 12:17 PM and served the same on February 28th, 2022 at 1:00 PM in Collier County, Florida, to wit:

**SUBSTITUTE** service was made by delivering a true copy of this writ together with a copy of the initial pleadings, if any, with the date and hour of service endorsed thereon by me, at the usual place of abode with a member of the household, who is fifteen (15) years of age, or older and informing them of the contents thereof pursuant to F.S. 48.031(1)(a): LU ANN PAPPAS, Spouse.

Comments:

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KEVIN J. RAMBOSK, SHERIFF

COLLIER COUNTY, FLORIDA



Frederick Schafer 960

Deputy Sheriff, Collier County Sheriff's Office

Sheriff's Number: 22000629

**ORIGINAL**

**EXHIBIT B**

FILED DATE: 3/28/2022 2:30 PM 2021L008366

This form is approved by the Illinois Supreme Court and is required to be accepted in all Illinois Circuit Courts.

<b>STATE OF ILLINOIS, CIRCUIT COURT</b>  Cook <input type="checkbox"/> <b>COUNTY</b>		<b>SUMMONS</b>		For Court Use <b>FILED</b> 2/17/2022 1:15 PM IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 2021L008366  16751487
<b>Instructions ▼</b> Enter above the county name where the case was filed.  Enter your name as Plaintiff/Petitioner.  Enter the names of all people you are suing as Defendants/Respondents.  Enter the Case Number given by the Circuit Clerk.	DALE D. WHITE <b>Plaintiff / Petitioner</b> (First, middle, last name)  v.  JOHN G. PAPPAS and VITRACOAT AMERICA, INC., <b>Defendant / Respondent</b> (First, middle, last name)  <input checked="" type="checkbox"/> <b>Alias Summons</b> (Check this box if this is not the 1 <sup>st</sup> Summons issued for this Defendant.)		2021 L 8366 <b>Case Number</b>	

**IMPORTANT INFORMATION:**

There may be court fees to start or respond to a case. If you are unable to pay your court fees, you can apply for a fee waiver. You can find the fee waiver application at: [illinoiscourts.gov/documents-and-forms/approved-forms/](http://illinoiscourts.gov/documents-and-forms/approved-forms/).

E-filing is now mandatory with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit [efile.illinoiscourts.gov/service-providers.htm](http://efile.illinoiscourts.gov/service-providers.htm) to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit [illinoiscourts.gov/faq/gethelp.asp](http://illinoiscourts.gov/faq/gethelp.asp) or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your circuit clerk for more information or visit [illinoislegalaid.org](http://illinoislegalaid.org).

Call or text Illinois Court Help at 833-411-1121 for information about how to go to court including how to fill out and file forms. You can also get free legal information and legal referrals at [illinoislegalaid.org](http://illinoislegalaid.org).

**Plaintiff/Petitioner:**

Do not use this form in an eviction, small claims, detinue, divorce, or replevin case. Use the *Eviction Summons, Small Claims Summons, or Summons Petition for Dissolution of Marriage / Civil Union* available at [illinoiscourts.gov/documents-and-forms/approved-forms/](http://illinoiscourts.gov/documents-and-forms/approved-forms/). If your case is a detinue or replevin, visit [illinoislegalaid.org](http://illinoislegalaid.org) for help.

If you are suing more than 1 Defendant/Respondent, fill out a *Summons* form for each Defendant/Respondent.

In 1a, enter the name and address of a Defendant/Respondent. If you are serving a Registered Agent, include the Registered Agent's name and address here.

In 1b, enter a second address for Defendant/Respondent, if you have one.

In 1c, check how you are sending your documents to Defendant/Respondent.

**1. Defendant/Respondent's address and service information:**

a. Defendant/Respondent's primary address/information for service:

Name (First, Middle, Last): John G. Pappas

Registered Agent's name, if any:

Street Address, Unit #: 3653 Periwinkle Way

City, State, ZIP: Naples, Florida 34114-2538

Telephone: Email:

b. If you have more than one address where Defendant/Respondent might be found, list that here:

Name (First, Middle, Last):

Street Address, Unit #:

City, State, ZIP:

Telephone: Email:

c. Method of service on Defendant/Respondent:

☐ Sheriff

☒ Sheriff outside Illinois: Collier County Florida  
County & State

☐ Special process server

☐ Licensed private detective

**ORIGINAL**

KEVIN RAMBOSK, Sheriff  
Collier County

By: *[Signature]*  
Date: 3-28-22 Time: 1:30 PM



**EXHIBIT B**<sup>(06/21)</sup>

**BUSINESS INFORMATION**  
 HOLLI SULLIVAN  
 INDIANA SECRETARY OF STATE  
 03/23/2022 03:44 PM

#### Business Details

Business Name: <b>VITRACOAT AMERICA, INC.</b>	Business ID: <b>2008052700721</b>
Entity Type: <b>Foreign For-Profit Corporation</b>	Business Status: <b>Active</b>
Creation Date: <b>05/23/2008</b>	Inactive Date:
Principal Office Address: <b>2807 Marina Dr., Elkhart, IN, 46514, USA</b>	Expiration Date: <b>Perpetual</b>
Jurisdiction of Formation: <b>Delaware</b>	Business Entity Report Due Date: <b>05/31/2022</b>
Original Formation Date: <b>09/05/2000</b>	Years Due: <b>2022/2023</b>

#### Governing Person Information

Title	Name	Address
Vice President	LUIS MOUSSALI	2807 Marina Drive, Elkhart, IN, 46514, USA
President	EDUARDO MOUSSALI	2807 Marina Drive, Elkhart, IN, 46514, USA
Vice President	Luis Moussali	2807 Marina Dr., Elkhart, IN, 46514, USA

#### Registered Agent Information

Type: **Business Commercial Registered Agent**  
 Name: **CORPORATION SERVICE COMPANY**  
 Address: **135 North Pennsylvania Street, Suite 1610, Indianapolis, IN, 46204, USA**



**From:** [Gustin, Courtney](#)  
**To:** ["Mark Byrd"](#)  
**Subject:** RE: White v. Pappas  
**Date:** Monday, February 14, 2022 3:45:00 PM

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Hi Mark,

Thank you for the updated information. Unfortunately I am not sure how case value will impact whether the lawsuit gets bumped to Arbitration. Although I have experience with Judge Flanagan, the Arbitration procedure for Law Division is new.

I look forward to hearing from you tomorrow.

Sincerely,

Courtney

**K. Courtney Gustin**

Cincinnati Insurance Company Staff Defense  
Legal Litigation Department - Chicago  
10 S. LaSalle Street  
Suite 3310  
Chicago, IL 60603  
(312) 429-4858 (Direct)  
(312) 281-7040 (Office)  
(312) 251-0258 (Fax)  
[Courtney\\_Gustin@staffdefense.com](mailto:Courtney_Gustin@staffdefense.com)

**Confidentiality notice:** The information included in this email, including any attachments, is for the sole use of the intended recipient and may contain information that is confidential and protected. Any unauthorized review, use, disclosure, distribution or similar action is prohibited. If you are not the intended recipient, please contact the sender and delete all copies of the original message immediately. For additional information on our privacy policies, including state specific information, please visit our [privacy policy](#)

**\*\*\*Attention\*\*\***

*In light of the nationwide COVID-19 health emergency, our office will be working remotely for an indefinite period of time. To facilitate a timely response, kindly provide all communication and documents to our office **electronically via e-mail**. Please avoid using regular mail if possible. If you are unable to send materials electronically, please contact the attorney on the file to discuss the matter. We appreciate your anticipated cooperation.*

---

**From:** Mark Byrd <byrdlaw@comcast.net>  
**Sent:** Monday, February 14, 2022 2:18 PM  
**To:** Gustin, Courtney <Courtney\_Gustin@staffdefense.com>  
**Subject:** White v. Pappas

This Message Is From an External Sender

**EXHIBIT D**

This message came from outside your organization.

Good Afternoon Ms. Gustin,

Just an update my client brought his initial Answers to Interrogatories and Request to Produce to my office this morning (Rough will need some work) as well as all past medical records and bills. I was mislead on the amount of medical specials for past medical. Those actually total \$94,220.10 excluding future medical and for the cost of dental implants. Do you think the amount of actual damages puts us out of the Arbitration issue or do you think the Judge will want us to still go through that. I'm ok with it either way just checking based on your prior experience with her.

I will contact you in the morning to discuss what you want included in the email to Judge Flanagan and to send you a copy of the proposed CMO.

Thanks and have a Great Day!

Mark A. Byrd

**Mark A. Byrd P.C.**  
**Attorney at Law**  
**308 W. State St. Ste. 450**  
**Rockford, IL 61101**  
**(815) 964-5492 Office**  
**(815) 964-5395 Fax**  
**[byrdlaw@comcast.net](mailto:byrdlaw@comcast.net)**

**STATEMENT OF CONFIDENTIALITY:** The information contained in this electronic message and any attachments to this message are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering the e-mail to the intended recipient, be advised you have received this message in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited.

FILED DATE: 3/24/2022 3:01 PM 2021L008366

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY \_\_\_\_\_ DEPARTMENT/ LAW \_\_\_\_\_ DISTRICT \_\_\_\_\_

DALE D. WHITE,  
\_\_\_\_\_  
Plaintiff  
v.  
JOHN G. PAPPAS and VITRACOAT AMERICA, INC.  
\_\_\_\_\_  
Defendant

No. 2021 L 008366  
Claimed \$: \_\_\_\_\_  
Return Date: \_\_\_\_\_  
Time: \_\_\_\_\_  
Court Date: \_\_\_\_\_  
Room No.: \_\_\_\_\_  
Address of Court District for Filing

FILED  
3/24/2022 3:01 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2021L008366  
Calendar, E  
17228327

APPEARANCE AND JURY DEMAND\*

- ☒ General Appearance
- ☒ 0900 - Fee Paid
- ☐ 0904 - Fee Waived
- ☐ 0908 - Trial Lawyers Appearance - No Fee
- ☒ Jury Demand\*
- ☒ 1900 - Appearance and Jury Demand/Fee Paid
- ☒ Twelve-person Jury
- ☐ 1904 - Appearance and Jury Demand/Fee Waived
- ☐ Six-person Jury

The undersigned enters the appearance of: ☐ Plaintiff ☒ Defendant  
JOHN G. PAPPAS

(Insert Litigant's Name)  
  
Signature


- ☒ Initial Counsel of Record
- ☐ Pro Se (Self-represented)
- 2810
- ☐ Rule 707 Out-of-State Counsel (pro hac vice)
- ☐ Additional Appearance
- ☐ Substitute Appearance

☒ Atty. No.: 59695 ☐ Pro se 99500  
Name: K. Courtney Gustin  
Atty. for: Defendants  
Address: 10 South LaSalle Street, Suite 3310  
City/State/Zip: Chicago, Illinois 60603  
Telephone: 312-281-7040  
Primary Email: courtney\_gustin@staffdefense.com  
Secondary Email: christina\_larcher@staffdefense.com  
Tertiary Email: kristi\_lyons@staffdefense.com

**Important**  
*Once this Appearance form is filed, photocopies of this form must be sent to all other parties named in this case (or to their attorneys) using either regular mail, facsimile transmission (fax), Email transmission or personal delivery. (See Illinois Supreme Court Rules 11 and 13 for more information.)*

**Pro Se Only:** ☐ I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address: \_\_\_\_\_

\*Strike demand for trial by jury if not applicable.  
I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

  
Attorney for ☐ Plaintiff ☒ Defendant